

1 J Christopher Jorgensen  
Nevada Bar No. 5382  
2 Adrienne R. Brantley  
Nevada Bar No. 14486  
3 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
3993 Howard Hughes Parkway, Suite 600  
4 Las Vegas, NV 89169  
Phone: (702) 949-8200  
5 Email: [cjorgensen@lrrc.com](mailto:cjorgensen@lrrc.com)  
Email: [abrantley@lrrc.com](mailto:abrantley@lrrc.com)

6 *Attorneys for Defendant, Navient Solutions, LLC*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 RUTH A. KANE,

11 Plaintiff,

12 vs.

13 NAVIENT SOLUTIONS, LLC; EQUIFAX  
INFORMATION SERVICES, LLC,

14 Defendants.

Case No.: 2:18-cv-00406-JAD-PAL

**STIPULATION TO EXTEND DEFENDANT  
NAVIENT SOLUTIONS, LLC'S TIME TO  
RESPOND TO COMPLAINT**

**(FIRST REQUEST)**

15  
16 This Stipulation to Extend Time to Respond to Complaint is made by and between  
17 Plaintiff Ruth A. Kane ("Plaintiff") and Defendant Navient Solutions, LLC ("NSL")  
18 through their respective counsel, in light of the following facts:

19 RECITALS

20 A. Plaintiff filed the Complaint ("Complaint") against NSL on or about March  
21 7, 2018.

22 B. NSL was served with the Complaint on or about March 8, 2018.

23 C. NSL's current deadline to respond to the Amended Complaint is March 29,  
24 2018.

25 D. The parties agreed that NSL would have through April 26, 2018 to respond  
26 to the Complaint in order to give NSL time to investigate Plaintiff's claims and prepare a  
27 proper response, and for the parties to discuss a potential resolution of this matter.

28 ///

1 E. There is good cause to grant this stipulation because NSL requires additional time  
2 to investigate Plaintiff's claims and prepare a proper response, and the parties  
3 require additional time to consider a resolution of this matter.

4 F. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and NSL respectfully  
5 request that the Court extend NSL time to respond to Plaintiff's Complaint through April 26,  
6 2018.

7 **STIPULATION**

8 NOW, THEREFORE, Plaintiff and NSL hereby stipulate and agree that NSL has up to  
9 and including April 26, 2018, to file a response to Plaintiff's Complaint.

10 **IT IS SO STIPULATED.**

11 Dated: March 23, 2018

12 HAINES & KRIEGER, LLC


13  
14 By: /s/ Rachel B. Saturn  
15 David H. Drieger  
16 Rachel B. Saturn  
Attorneys for Plaintiff Ruth A. Kane

Dated: March 23, 2018.

LEWIS ROCA  
ROTHGERBER CHRISTIE LLP

By: /s/ Adrienne R. Brantley  
J Christopher Jorgensen  
Adrienne R. Brantley  
Attorneys for Defendant  
Navient Solutions, LLC

17  
18  
19 **IT IS SO ORDERED**

20   
21 Peggy A. Leen  
22 United States Magistrate Judge

23 DATED March 26, 2018  
24  
25  
26  
27  
28